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8 Attorneys for Plaintiff
9 ST. PAUL MERCURY INSURANCE COMPANY

10
11 UNITED STATES DISTRCIT COURT
12 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

13
14 ST. PAUL MERCURY INSURANCE
15 COMPANY, a Minnesota corporation

16 Plaintiff,

17 v.

18 AMERICAN SAFETY INDEMNITY
19 COMPANY, an Oklahoma corporation;
20 CENTURY SURETY COMPANY, an Ohio
corporation; CHARTIS SPECIALTY
21 INSURANCE COMPANY, an Illinois
corporation; CLARENDRON AMERICA
INSURANCE COMPANY, New Jersey
corporation; FIRST MERCURY
22 INSURANCE COMPANY; an Illinois
corporation; GEMINI INSURANCE
COMPANY, a Delaware corporation;
23 GRANITE STATE INSURANCE
COMPANY, a Pennsylvania corporation;
24 GREAT AMERICAN INSURANCE
COMPANY, an Ohio corporation;
25 HARTFORD CASUALTY INSURANCE
COMPANY, an Indiana corporation;
26 INTERSTATE FIRE & CASUALTY
COMPANY, an Illinois corporation;
27 IRONSHORE SPECIALTY INSURANCE
COMPANY, an Arizona corporation;

Case No. 12-CV-05952-LHK-HRL

STIPULATION GRANTING DEFENDANT
CENTURY SURETY COMPANY A
FOURTH EXTENSION OF TIME TO
RESPOND TO THE COMPLAINT

Trial: None

1 LEXINGTON INSURANCE COMPANY, a
2 Delaware corporation; NATIONAL UNION
3 FIRE INSURANCE COMPANY, a
4 Pennsylvania corporation; NATIONAL FIRE
5 & MARINES INSURANCE COMPANY, a
6 Nebraska corporation; NAVIGATORS
7 INSURANCE COMPANY, a New York
8 corporation; NIC INSURANCE COMPANY,
9 a New York corporation; NORTH
10 AMERICAN CAPACITY INSURANCE
11 COMPANY, a New Hampshire corporation;
OLD REPUBLIC INSURANCE COMPANY,
a Pennsylvania corporation; PRAETORIAN
INSURANCE COMPANY, a Pennsylvania
corporation; ROCKHILL INSURANCE
COMPANY, an Arizona corporation;
VALLEY FORGE INSURANCE
COMPANY, a Pennsylvania corporation;
VIRGINIA SURETY COMPANY, an Illinois
corporation; and Does 1-10, inclusive

12 Defendants.

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15 Pursuant to Local Rule 6.1, Plaintiff, St. Paul Mercury Insurance Company hereby
16 stipulates that Defendant Century Surety Company may have a fourth extension of time
17 within which to respond to the Complaint on file up to and including Monday, March 4,
18 2013 to allow the parties further time to discuss informal resolution. This is the fourth and
19 will be the final extension of time, following a 28-day extension up to and including January
20 31, 2013, a 14-day extension up to and including February 14, 2013, and a 7-day extension
21 up to and including February 21, 2013. The parties expect to have this matter resolved
22 shortly and request this final extension to allow for this to be finalized. This extension will
23 not impact any dates scheduled for the case, as the Initial Case Management Conference is
24 currently set for April 4, 2013.
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1 Dated: February 21, 2013

THE AGUILERA LAW GROUP, APLC

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8 A. Eric Aguilera, Esq.
9 Daniel Eli, Esq.
10 Adam A. Wright, Esq.
11 Attorneys for Plaintiff
12 ST. PAUL MERCURY INSURANCE COMPANY

13 Dated: February 21, 2013

WOOLLS & PEER
A Professional Corporation

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15
16 Lisa Darling-Alderton, Esq.
17 Attorneys for Defendant
18 CENTURY SURETY COMPANY

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED 4/02/2013

19 BY

20 Lucy H. Koh

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1 **PROOF OF SERVICE**
2

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES
4

5 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not
6 a party to the within action; my business address is 700 S. Flower St., Ste. 3350, Los Angeles,
7 California 90017.

8 On February 21, 2013, I served the foregoing document described as: **STIPULATION**
9 **GRANTING DEFENDANT CENTURY SURETY COMPANY A FOURTH EXTENSION**
10 **OFTIME TO RESPOND TO THE COMPLAINT** on the interested parties in this action.
11

12 **BY U.S. MAIL**
13

14 () *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed
15 with postage thereon fully prepaid.
16

17 As follows: I am "readily familiar" with the firm's practice of collection and processing
18 correspondence for mailing. Under the practice it would be deposited with U.S. postal service on
19 that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course
20 of business. I am aware that on motion of the party served, service is presumed invalid if postal
21 cancellation date or postage date is more than 1 day after date of deposit for mailing in affidavit.
22

23 **BY ELECTRONIC SERVICE VIA ECF** I transmitted a true copy of the above entitled
24 document(s) to CM/ECF for filing and service on all parties.
25

26 (State) I declare under penalty of perjury under the laws of the State of California that the
27 above is true and correct.
28

29 (Federal) I declare that I am employed in the office of a member of the bar of this court at
30 whose direction the service was made.
31

32 Executed on February 21, 2013 at Los Angeles, California.
33

34 _____
35 /s/ Judy Jaramillo
36 Judy Jaramillo
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